## IN THE DISTRICT COURT OF VIRGIN ISLANDS DIVISION OF ST. CROIX

KAREN DEWOLFE AND ALAN DEWOLFE	)
Plaintiffs,	)
v.	Civil Action No. 1:19-CV-56
AARP SERVICES, INC., AARP, INC., AARP OF THE VIRGIN ISLANDS, INC., GRUPO COOPERATIVE SEGUROS MULTIPLES, COOPERATIVE DE SEGUROS MULTIPLES OF PUERTO RICO, OVERSEAS INSURANCE AGENCY, INC., SEDGWICK CLAIMS MANAGEMENT SERVICES, INC., VERICLAIM, INC., and BYRON GILCHREST,	) ) ) ) )
Defendants.	) ) )

## **FIRST MOTION FOR EXTENSION OF TIME**

COMES NOW Plaintiffs, Karen DeWolfe and Alan DeWolfe, by and through the undersigned counsel, and moves this Honorable Court for the entry of an Order granting an extension of time until June 6, 2023 to file objections to the Magistrate Judge's Protective Order dated May 5, 2023 in this matter with the District Court. In further support Plaintiffs states the following:

The Protective Order was entered on May 5, 2023. Any objections to that Order must be filed by May 19, 2023.

The undersigned counsel left island on May 8, 2023 to attend a deposition on May 9, 2023 in the matter of *Ruth Miller, et al. v. AARP, et al.,* in Philadelphia. Thereafter counsel attended the Third Circuit Conference, also in Philadelphia from May 10, 2023 to May 12, 2023, returning to St. Croix late on May 13, 2023.

Since her return counsel has been preparing for the mediations scheduled for next week in this and two other related cases. Counsel also has an expedited brief due in the Virgin Islands Supreme Court and a Sentencing in a criminal case in the Superior Court of the Virgin Islands that is scheduled for next week.

Thereafter, Counsel will be undergoing medical diagnostic testing pursuant to her doctor's orders on May 30, 2023, June 1, 2023 and June 5, 2023.

Seguros Multiples and the Adjusters Defendants' counsel have no objection to this motion. At the time of filing this motion, Counsel for AARP Defendants did not respond as to their position to this motion.

WHEREFORE, Plaintiffs request that this Court enter an Order granting an extension of time until June 6, 2023 to file objections to the Magistrate Judge's Protective Order dated May 5, 2023 in this matter with the District Court.

## RESPECTFULLY SUBMITTED

LAW OFFICES OF PAMELA LYNN COLON, LLC Attorney for Plaintiffs

DATED: May 19, 2023 By: /s/Pamela Lynn Colon, Esquire

Pamela Lynn Colon, Esquire

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